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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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972 IRREVOCABLE TRUST and
INTERMED GAS PRODUCTS, LLC.

Docket No. 1:08-cv-04907-RPP

Plaintiffs,

-against-

MICHAEL LAING, ROBERTA A.
PUGLIESE, LAING HOLDINGS
CORPORATION and INTERACTIVE
MEDICAL TECHNOLOGIES, CORP.,

Defendants.

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**DECLARATION OF ROBERT L. RIMBERG, ESQ. IN OPPOSITION OF
DEFENDANTS' MOTION TO DISQUALIFY ROBERT L. RIMBERG, ESQ. AND
GOLDBERG & RIMBERG, PLLC AS COUNSEL FOR PLAINTIFFS**

ROBERT L. RIMBERG, an attorney admitted to practice before this Court declares:

1. I am a Member of Goldberg & Rimberg, PLLC, counsel to Plaintiffs 972 Irrevocable Trust and Intermed Gas Products, LLC (the "Company", and collectively referred to as "Plaintiffs"). I submit this declaration in opposition to Defendants' immediate motion.
2. I have met with Michael Laing ("Laing") on four (4) occasions.
3. On two occasions the purpose of the meetings were to discuss financial spreadsheets he prepared. On one occasion I met a potential employee, and the final meeting was the day he was terminatd.

4. At each meeting I was present as an attorney for third party investors in the Company. I do have some of my own money in the Company as well.

5. At each meeting there were always present other individuals that are not only more familiar with the financials, but to whom Mr. Laing regularly reported.

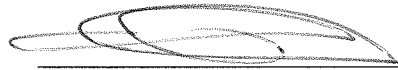
6. I have no information relevant to the Company that cannot be testified to by other people.

7. Any personal relationship I may have with Intermed is independent of the allegations set forth in the Amended Complaint in this action.

8. I am honored that the defendants have such a high regard for my talent that they would file the instant motion, however, I know nothing novel that would require my testimony in the action.

WHEREFORE, it is respectfully requested that the Court deny Defendants' motion in its entirety.

Dated: New York, New York
June 24, 2008


Robert L. Rimberg, Esq.